

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
Caption in Compliance with D.N.J. LBR 9004-1(b)**

**GENOVA BURNS LLC**  
Daniel M. Stolz, Esq.  
Donald W. Clarke, Esq.  
Lorrie Denson, Esq.  
110 Allen Rd., Suite 304  
Basking Ridge, NJ 07920  
(973) 230-2095  
DStolz@genovaburns.com  
DClarke@genovaburns.com  
LDenson@genovaburns.com

*Local Counsel for the Plan Administrator*

In re:

BLOCKFI INC., *et al.*,

Wind-Down Debtors.<sup>1</sup>

Case No.: 22-19361 (MBK)

Judge: Hon. Michael B. Kaplan

Chapter: 11

Subchapter V: ☐ Yes ☒ No

**ADJOURNMENT REQUEST**

1. I, Donald W. Clarke, Esq.

☒ am the attorney for: the Plan Administrator and Plaintiffs,

☐ am self-represented,

and request an adjournment of the hearings on the following matters for the reason set forth below.

- i. *BlockFi International Ltd.'s Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Holding Vrai Nom in Contempt and Imposing Sanctions for Willful Violations of the Automatic Stay and (III) Granting Related Relief* [Docket No. 1330].
- ii. *Letter Brief in Opposition to BlockFi International Ltd.'s Motion for Entry of an Order (I) Enforcing the Automatic Stay, (II) Holding Vrai Nom in Contempt and*

<sup>1</sup> The Wind-Down Debtors in these chapter 11 cases, along with the last four digits of each Wind-Down Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (in liquidation) (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is: c/o M-3 Partners LP, 1700 Broadway, 19th Floor, New York, NY 10019.

*Imposing Sanctions for Willful Violations of the Automatic Stay and (III) Granting Related Relief* [Docket No. 1495]

iii. Pre-Trial Hearing in Adversary Proceeding No. 23-01175 (MBK).

**Current hearing date and time:** January 16, 2024, at 11:00 a.m. (ET)

**New date requested:** February 27, 2024, at 11:00 a.m. (ET)

**Reason for adjournment request:** The parties respectfully request that the Court adjourn the hearing on the matters set forth above to February 27, 2024, to permit the parties additional time to finish documenting their settlement agreement. Pursuant to D.N.J. LBR 9013-2(a)(3), Vrai Nom has agreed to allow the Plan Administrator until February 23, 2024, to file a reply. All other rights of the parties are reserved.

2. Consent to adjournment:

☒ I have the consent of all parties. ☐ I do not have the consent of all parties (explain below):

I certify under penalty of perjury that the foregoing is true.

Date: January 9, 2023

/s/ Donald W. Clarke

Signature

**COURT USE ONLY:**

The request for adjournment is:

2/27/2024 at 11:00 a.m.

- |  |                            |                                     |
|--|----------------------------|-------------------------------------|
| <input checked="" type="checkbox"/> Granted        | New hearing date: <u>X</u> | <input type="checkbox"/> Peremptory |
| <input type="checkbox"/> Granted over objection(s) | New hearing date: _____    | <input type="checkbox"/> Peremptory |
| <input type="checkbox"/> Denied                    |                            |                                     |

**IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.**